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7 Attorneys for Defendants
AMERICAN STAFFING OF NEVADA, INC. AND
8 AMERICAN STAFFING, INC.

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 BOBETTE COUSINEAU, an individual,
13 Plaintiff,

14 v.

15 AMERICAN STAFFING OF NEVADA, INC., a
domestic corporation; AMERICAN STAFFING,
16 INC., a foreign corporation; EXEL, INC. d/b/a
DHL SUPPLY CHAIN, a foreign corporation;
17 DOES I through X; and ROE Corporations XI
through XX, inclusive,
18 Defendants.
19

Case No.: 2:21-cv-01046-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER TO DISMISS ACTION, WITH
PREJUDICE**

20
21 Plaintiff BOBETTE COUSINEAU, Defendants AMERICAN STAFFING OF NEVADA,
22 INC.¹ and AMERICAN STAFFING, INC., and Defendant EXEL, INC. d/b/a DHL SUPPLY CHAIN,
23 by and through their respective attorneys of record, hereby stipulate and respectfully request an order
24 dismissing the entire action with prejudice.

25 The parties further agree that each party shall bear its own costs and attorneys' fees. The
26 parties to this stipulation agree that none of them shall be deemed to be a prevailing party in this action
27 and that none will file for an award of attorneys' fees or costs pursuant to any rule, statute, or law,
28

¹ This entity is a d/b/a of Defendant employer American Staffing, Inc.

whether local, state, or federal in any forum that would be available.

Dated: September 28, 2021

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Respectfully submitted,

Respectfully submitted,

/s/ Kaine Messer

CHRISTIAN GABROY, ESQ.
KAINE MESSER, ESQ.
GABROY LAW OFFICES

/s/ Z. Kathryn Branson

Z. KATHRYN BRANSON, ESQ.
EMIL S. KIM, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Plaintiff
BOBETTE COUSINEAU

Attorneys for Defendants
AMERICAN STAFFING OF NEVADA,
INC. and AMERICAN STAFFING, INC.

Dated: September 28, 2021

Respectfully submitted,

/s/ Todd M. Seaman

ANTHONY C. WHITE, ESQ. (*admitted pro hac vice*)
TODD M. SEAMAN, ESQ. (*admitted pro hac vice*)
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HOLLY E. CHEONG, ESQ.
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Attorneys for Defendant
EXEL, INC. d/b/a DHL SUPPLY CHAIN

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE
RICHARD F. BOULWARE, II

DATED this 29th day of September, 2021.